

**United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report**

Case Number

1000-0463

Case Title:

Perma-Fix Northwest, Inc. (PFNW)

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20130730 Interview with [REDACTED] of Perma-Fix Northwest, Inc.

Activity Date:

July 30, 2013

Reporting Official and Date:

[REDACTED]

Special Agent

23-SEP-2013, Signed by [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

23-SEP-2013, Approved by [REDACTED]

Assistant Special Agent in Charge

SYNOPSIS

On July 30, 2013, SA [REDACTED] and SA [REDACTED] interviewed [REDACTED] at [REDACTED] in Richland, Washington, regarding [REDACTED] knowledge of the activities of Perma-Fix Northwest.

DETAILS

On July 30, 2013, at approximately 1704 hours, SA [REDACTED] and I interviewed [REDACTED] at [REDACTED] in Richland, Washington, regarding [REDACTED] knowledge of the activities of Perma-Fix Northwest. After being notified of the identities of the interviewing agents and the nature of the interview, [REDACTED] provided, in substance, the following information:

[REDACTED] began his employment with Perma-Fix Northwest (PFNW) in August of 2007 as a [REDACTED] and eventually worked [REDACTED] way into a position with the transportation section of PFWN. Prior to [REDACTED] employment with PFWN, [REDACTED] was employed by Hanford as a Waste Surveyor for approximately five years.

PFNW primarily handles two types of wastes from Hanford; low level radioactive material and mixed hazardous waste which consist of approximately 90 percent "debris." The low level material is condensed and treated for eventual disposal at government facilities. The mixed waste is man-made items larger than sixteen millimeters in size. These are treated and returned to Hanford to await burial at the Hanford site.

PFNW does not conduct "stabilization" processes for all materials but can complete this for soils. As an example, when PFWN receives lead contaminated soil the company could develop a "recipe" for stabilizing it, which could include encasing it in grout.

PFNW does treat TRUM Waste, but only up to the company's radioactive concentration limit which is limited to the company's Washington Department of Health permit for PFWN. They are only allowed a certain amount of TRUM waste on the PFWN property at any one time. PFWN has a computer tracking system which records all of the radioactive material which enters and leaves the PFWN facility. The Hanford truck manifests explain how much waste is coming in advance of its arrival at PFWN.

When Hanford sends PFWN a shipment, a specific profile is generated for each area of concern. Many contractors at Hanford generate a profile and they evaluate the waste stream while designating it on site inside of the Hanford facility. The profile is then approved by PFWN and PFWN receives a pre-shipment notification. If PFWN receives anything in which they are not

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notified of or didn't agree to, they contact Hanford to work out the problem.

Once the material has been received by PFNW from Hanford, a full identification of all materials is completed. Although it doesn't happen often, if PFNW finds any waste material which is non-conforming, , the waste is returned to Hanford. Hanford designates their waste through a TSD prism. TRUM waste from storage is usually designated based on information found in historical records. TRUM waste on a Hanford site does not use historical documentation. TRUM waste from the site arrives with a profile of records and sampling results. Hanford does not ask PFNW to designate at the PFNW facility. ■ knows that Hanford still has to identify all of the waste codes even if it is listed as "debris."

All shipments arrive Land Disposal Requirements (LDR) and waste codes. PFNW receives the LDRs prior to the shipment's arrival at PFNW. PFNW will then evaluate the waste stream to find out if they have the ability and permission to receive the waste.

■ knows that Hanford has been shipping very little waste to PFNW lately. This has caused a drop in the PFNW work force by approximately fifty percent. ■ believes this drop off in material delivery is due to a lack of finances on Hanford's part. ■ believes PFNW has received between six and seven loads from Hanford this year. ■ knows that WPRS regularly ships waste material including PPE, but not anything from the recently discovered leaking tanks at Hanford.

Depending on the material being shipped to and from Hanford it could be sent between the facilities through the use of road closure. These shipments are not regulated by the Department of Transportation and consist of an approximate ten mile trip with Hanford security escorting the trucks. These trips are taken on a divided highway which allows the opposite traffic to continue to travel, but adjacent traffic is stopped. These usually occur in the evenings after 7 P.M. There is constant communication between Hanford and PFNW regarding these road closures. As an example PFP TRUM waste receives the rolling road closure treatment.

■ is aware of the various types of containers in which waste is transferred between the companies such as WIPP certified packaging including Type A and Type B. With rolling road closures, ■ believes that Type A containers are safe for transportation because Type B containers are cost prohibitive. ■ knows PFNW's trucks are inspected on a quarterly basis. ■ contact at the Department of Energy is Dennis Closson. ■ does not know if the Washington State Patrol is notified of shipments between the companies. ■ believes the company has a transportation permit which allows them to transport, but ■ is unsure.

The Washington Department of Health (DOH) visits PFNW regularly in order to review the company's new radiation policy and DOH personnel are familiar with the radiation policies of the company. The Washington Department of Ecology does not inspect the company nearly as often. Radioactivity is the biggest hazard that PFNW faces, with RCRA not being a large problem for the company.

When a container unit arrives at PFNW it goes directly to the containment pad. The unit is scanned for radiation and the paperwork is checked for accuracy. The unit is assigned a tracking number and the information goes into the PFNW database. PFNW can do sampling on site, but cannot sample out of the debris stream. PFNW would inspect the contents of the unit to make sure it fits

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the definition of debris.

PFNW continuously records the waste treatment activities through the use of an internal video security system. This is for employee safety and tracking the working of hazardous waste streams. These recordings are maintained for about a year. TRUM waste also has photos taken of it during processing.

■ is aware that NEIC found some violations in a recent inspection, but those issues have been corrected or improved.

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